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JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks and
Historic Preservation

September 11, 1985

RECEIVED

SEP 16 1985

Mr. Robert Schulte, President
Nixdorff-Krein Industries
P. O. Box 27479
St. Louis, Missouri 63141

MANAGED

Dear Mr. Schulte:

Enclosed is the report on compliance inspection of the Nixdorff-Lloyd Chain Company - St. Louis plant prepared by Mr. Joe Haake of my staff.

The report confirms that hazardous wastes are no longer generated at the site and that the facility has been properly closed.

In order to complete the agency file on this matter, please submit the required certification of closure upon completion to the Missouri Department of Natural Resources - Waste Management Program.

Thank you for your attention to the situation.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Duvall

Mike Duvall
Chief - Waste Management Unit

MD:mc
Encl.

✓ CC: Central Office - WMP, Enforcement/Superfund Section



R00343021
RCRA RECORDS CENTER

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RCRA COMPLIANCE INSPECTION REPORT

FACILITY

Nixdorff-Lloyd Chain Company
916 Howard Street
P. O. Box 14828
St. Louis, Missouri 63118
(314) 872-8500

MDNR GENERATOR ID#: 01514
EPA ID#: MOD000010975

Mr. Robert Schulte - President

INTRODUCTION

An inspection of the Nixdorff-Lloyd Chain Company was conducted on September 6, 1985, to assess compliance with all applicable requirements pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law. Messrs. Joe Fiala and Dean Palmer of O'Brien & Gere Engineers, Inc., accompanied the inspector throughout the plant visit. Mr. Schulte was contacted by telephone prior to the inspection and provided detailed closure information.

The Nixdorff-Lloyd Chain Company is now closed. Site closure has proceeded in accordance with the approved facility closure plan, and closure certification is being completed.

Regulated hazardous waste was generated at the facility during the production of steel chain, hardware items, and other multislide wire forms which involved pickling with sulfuric acid and zinc electroplating. These processes were discontinued in early 1983. Since that time the facility was engaged in the production of agriculture tillage equipment with no generation of hazardous waste (see October 16, 1984, compliance inspection report).

UNSATISFACTORY FEATURES

None

DISCUSSION

In December 1984, site closure was accomplished. The large concrete holding pit for spent sulfuric acid was scrubbed down and rinsed. The pit was then filled in with concrete chunks and dolomite and sealed with

a concrete cap. Electroplating lines were washed and removed. All rinsings were directed to the authorized MSD sewer for removal from the site. Product tanks and containers as well as empty containers were also removed.

All production equipment was sold to Laclede Chain Company (80%) and Beahl-Nixdorff Company (20%). Nixdorff-Lloyd Company still owns the building and leases part of it to Beahl-Nixdorff Company for the production of tillage equipment.

No hazardous waste was observed at the facility, and it appears that the site has been closed consistent with the closure plan.

RECOMMENDATIONS

None

Should you have any questions concerning this inspection report, please contact the St. Louis Regional Office.

APPROVED:

Mike D. Maddox

F. Donald Maddox *for*
Regional Administrator
St. Louis Regional Office

PREPARED BY:

Joe Haake

Joe Haake
Environmental Specialist II
St. Louis Regional Office

FDM/JH/mc
Encl.

Name of Facility: NIXDORFF-LEWIS CHAIN COMPANY

10 CSR 25-7.011(1)(D)

Date: 9-6-85

Address: 916 HOWARD STREET

ST. LOUIS, MISSOURI 63118

Missouri I.D. # 01514

Facility Representative: ROBERT SCHULTE

EPA I.D. # MO DCC0010975

Title: PRESIDENT

Phone Number 314-872-3500

Is this facility a TSD? YES

Transporter? NO, # —

Provide a brief description of the manufacturing process.

FACILITY CURRENTLY CLOSED. PAST PROCESSES INCLUDED PICKLING WITH SULFURIC
ACID AND ZINC ELECTROPLATING.

List the hazardous wastes produced:

	Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1.	<u>NONE</u>				
2.					
3.					
4.					
5.					
6.					
	Total	<u>NONE</u>			

Subtract amount going to Resource Recovery or sewer

Amount subject to generator fee

(Fee is applicable if this value is over 10 kkg annually.
Fee based on generation from July 1 through June 30)

Is generator fee applicable to this facility? Yes — No ✓ (If yes, is it being paid? Yes — No —)

Is the head tax applicable to this facility? Yes — No ✓ (If yes, is it being paid? Yes — No —)
(Quarterly — Annually —)

Is the land disposal fee applicable to this facility? Yes — No ✓ (If yes, is it being paid? Yes — No —)

If the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes — No ✓

If the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes N/A No —

If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes N/A No —

Has the generator determined if waste is hazardous? Yes N/A No —

A. MANIFESTS 10 CSR 25-5.010(4)

N/A

1. Generator's Missouri and EPA I.D. Numbers ☐
2. Serially increasing shipment number ☐
3. Mo. waste I.D. # correct ☐
4. Generator's name, address, phone number, EPA I.D. number ☐
5. All transporters' names, addresses, phone numbers, and EPA I.D. numbers ☐
6. Hazardous waste management facility name, address, phone number, and EPA I.D. number ☐
7. Proper DOT shipping name and hazard class ☐
8. Quantity, container type, and number of units being shipped ☐
9. Emergency instructions and special handling procedures ☐
10. Proper certification ☐
11. Manifest properly signed and dated ☐
12. Time between generator and facility signature no more than ☐

13. Manifests returned within 30 days ☐
14. If not, exception generator report submitted within 45 days ☐
15. Completed manifests submitted to Department quarterly ☐

B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

N/A

16. Waste stored in proper DOT containers ☐
17. Containers labeled "Hazardous Waste" and labeled per proper DOT requirements during storage ☐

C. STORAGE STANDARDS 10 CSR 25-7.050

N/A

18. Facility inspected and maintained ☐
19. Ignitable and reactive wastes properly handled ☐
20. Date of accumulation marked ☐
21. Storage less than 90 days (if applicable) ☐
22. Waste oil properly handled ☐

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY
Interim Status Checklist
10 CSR 25-7.011(1)(D)

P. CLOSURE AND POST CLOSURE 40 CFR 265 Subpart G

100. Closure plan for facility..... ☒
101. Description of how and when facility will be closed.... ☒
102. Estimate of maximum inventory of hazardous waste..... ☒
103. Steps to decontaminate equipment..... ☒
104. Post closure plan for disposal facilities only..... ☒ *N/A*

Q. FINANCIAL REQUIREMENTS 40 CFR 265 Subpart H

105. Cost estimate for facility closure..... ☒
106. Financial assurance for closure and post closure..... ☒
107. Liability for sudden accidents..... ☒
108. Liability for non-sudden accidents for disposal only... ☒

R. INTERIM STATUS CONTAINERS 40 CFR 265 Subpart I *N/A*

109. Containers in good condition..... ☐
110. Containers made of materials compatible with hazardous wastes placed into them..... ☐
111. Containers kept closed during storage..... ☐
112. Hazardous waste containers storage area inspected once a week..... ☐
113. Inspection log..... ☐
114. Containers holding ignitable or reactive waste at least 50 ft. from the property line..... ☐
115. Incompatible wastes placed in different containers..... ☐
116. Are storage containers holding hazardous wastes which are incompatible with nearby materials separated by dikes, berms, walls, or other devices..... ☐

S. INTERIM STATUS TANKS CHECKLIST 40 CFR 265.192 *N/A*

117. Tanks in good condition..... ☐
118. Uncovered tanks have a minimum of 2 ft. of freeboard..... ☐
119. If not, is the tank equipped with a containment structure, a drainage control system, or a diversion structure..... ☐
120. Tanks with continuous inflow equipped with a means to stop inflow..... ☐
121. Are waste analyses conducted before placing a substantially different waste into a tank used for storage or treatment..... ☐
122. Daily inspections conducted on discharge control equipment..... ☐

123. Data gathered from monitoring equipment once each day.. ☐
124. Level of waste in tanks checked at least once each day. ☐
125. Tanks inspected weekly..... ☐
126. Results of these inspections recorded..... ☐
127. If ignitable or reactive wastes in tanks, then is it treated, rendered, or mixed so that the mixture no longer meets the definition of ignitable or reactive... ☐
128. Ignitable or reactive wastes stored properly..... ☐
129. Ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Agency's (NFPA's) buffer zone requirements..... ☐

T. INTERIM STATUS SURFACE IMPOUNDMENTS 40 CFR 265 Subpart K *N/A*

130. 2 ft. of freeboard in surface impoundment..... ☐
131. Earthen dikes have protective covers..... ☐
132. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment..... ☐
133. Freeboard level inspected each operating day..... ☐
134. Dikes and vegetation inspected weekly for leaks, deterioration, or failures..... ☐
135. Inspections recorded in inspection log..... ☐
136. Is the waste treated, rendered, or mixed so that mixture no longer meets the definition of ignitable or reactive..... ☐
137. Incompatible wastes segregated in separate surface impoundments..... ☐

U. GROUNDWATER MONITORING 40 CFR 265 Subpart F *N/A*

- Applicable to surface impoundments, landfills and landfarms
138. Monitoring program and wells installed..... ☐
139. Sampling and analysis during first year quarterly obtain copies 265.92..... ☐
140. After first year, semi-annual sampling and analysis of indicator parameters..... ☐
141. After first year, annual sampling and analysis of ground water quality parameters..... ☐
142. Evaluation using students t-test 265.93(b)..... ☐
143. Alternate groundwater monitoring system 265.90(d)..... ☐

Comments: SITE CLOSURE HAS PROCEEDED IN ACCORDANCE WITH THE FACILITY CLOSURE PLAN AND CLOSURE CERTIFICATION IS BEING COMPLETED

Please mark boxes as shown

☒ In compliance

☐ In violation

Inspector's Signature

Title

Office

Joe Hwaako
ESII
SLRO